



1850 M Street, N.W., 11th Floor
Washington, D.C. 20036
Telephone: (202) 828-7453

Jay C. Keithley
Vice President
Law and External Affairs
United Telephone Companies

May 26, 1993

REC'D
MAY 27 1993
FEDERAL COMMUNICATIONS COMMISSION

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20036

RE: In the Matter of Amendment to Part 61 of the Commission's Rules Requiring Metric Conversion of Tariff Publications and Supporting Information, CC Docket No. 93-55

Dear Ms. Searcy:

Attached are the original and five copies of the Comments of the United and Central Telephone Companies in the proceeding referenced above.

If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Jay C. Keithley".

Jay C. Keithley
Vice President
Law and External Affairs

Attachment

JCK/mlm

No. of Copies rec'd
List A B C D E

015

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

REC-100
APR 6 1993
FEDERAL COMMUNICATIONS COMMISSION

In the Matter of)	
)	
Amendment to Part 61 of the)	
Commission's Rules Requiring)	CC Docket No. 93-55
Metric Conversion of Tariff)	
Publications and Supporting)	
Information)	

COMMENTS OF SPRINT CORPORATION

Sprint Corporation ("Sprint"), on behalf of Sprint Communications Company, L.P., Sprint Cellular Company, and the Sprint Local Exchange Companies¹ ("the Sprint LECs"), pursuant to the Notice of Proposed Rulemaking², hereby provides its comments in the above referenced proceeding.

1. The Sprint Local Exchange Companies consist of the United Telephone Companies and the Central Telephone Companies. These companies are Carolina Telephone & Telegraph Company, United Telephone - Southeast, Inc., United Telephone of the Carolinas, United Telephone Company of Southcentral Kansas, United Telephone Company of Eastern Kansas, United Telephone Company of Kansas, United Telephone Company of Minnesota, United Telephone Company of Missouri, United Telephone Company of Texas, Inc., United Telephone Company of the West, United Telephone Company of Florida, The United Telephone Company of Pennsylvania, United Telephone Company of New Jersey, Inc., United Telephone Company of the Northwest, United Telephone Company of Ohio, United Telephone Company of Indiana, Inc., Central Telephone Company, Central Telephone Company of Florida, Central Telephone Company of Virginia, Central Telephone Company of Texas and Central Telephone Company of Illinois.

2. Amendment of Part 61 of the Commission's Rules Requiring Metric Conversion of Tariff Publications and Supporting Information, Notice of Proposed Rulemaking ("NPRM"), CC Docket No. 93-55, FCC 93-134, released April 8, 1993.

The Commission has proposed that those common carriers subject to its jurisdiction that file tariffs, begin to convert their tariffs to the metric system in regards to those items expressed in distance measurement units.³ The Commission has further proposed that a carrier adopt one of three options detailed in proposed Rule Sec. 61.37. Under this proposal a carrier could, in its general rules and regulations section of the tariff, "provide a conversion table for converting non-metric units and corresponding rates to metric units," or it could "state . . . the metric unit and corresponding rate in parenthesis simultaneously with the non-metric unit and rate," or it could "provide a conversion table for converting the non-metric units and corresponding rates . . . to metric units and rates" while publishing the "resulting metric unit and corresponding rate . . . in the tariff."⁴

On its face, the proposed Rule provides options to each carrier in adopting an appropriate compliance mechanism. However, in the text of the NPRM, the Commission suggests that some options may not be available to all carriers. For instance, the Commission states that "the first option offers smaller carriers a way to comply with the national

3. NPRM at par. 3.

4. Id. at Appendix A.

metric policy with minimal burden."⁵ Further, the Commission suggests that Tier 1 carriers have greater resources which would permit conversion without undue burden. The Commission seeks comment on whether the option method is appropriate or whether it should simply mandate one option for all carriers.⁶ Sprint strongly supports a system where each carrier is allowed to freely choose its preferred option.

In the NPRM, the Commission does not address billing to customers. All that is addressed is conversion in the tariffs. Sprint assumes that only the third option, where the tariff contains only metric units and rates and a conversion schedule is provided for conversion back into the current measurement system, might require actual billing in metric measurement. Changing to a combined metric and non-metric billing system would entail reprogramming, would be very expensive, would be confusing to users, and would not produce value to customers.

The Sprint companies have not been asked by customers to provide either metric conversion calculations or metric billing. Thus, it does not appear to Sprint that customers seek any change in billing arrangements that would require billing in metric units or in both English and metric units.

5. Id. at par. 10.

6. Id. at pars. 9-10.

The worst of both worlds would be evident if both metric and English measurement methods were required to appear in customer billing. The current billing systems would require massive and expensive upgrades to accommodate both formats for billing purposes. If the Commission were to expect such a change -- and Sprint strongly believes it should not -- carriers would need years of lead time in order to migrate their existing billing systems to billing in a metric format.

Further, because the Commission is only dealing with interstate tariffs, a change to a metric billing system could wreak havoc on customer understanding. Nothing in the proposed rule suggests that state regulators must also adopt metric measurement or billing. Customers confronted with two sets of bills -- an interstate metric-measured and an intrastate English-measured one -- would be understandably confused. Such an eventuality would lead to massive customer confusion. If, on the other hand, a uniform system is to be developed, a Federal-State Joint Board should consider the matter and adopt a common standard. This would reduce customer confusion and cost.

Sprint therefore supports the three option method that the Commission proposes, as long as each of the options are made available to all carriers. If, however, the Commission decides it should mandate one option for all carriers,

option three should not be adopted as a mandatory billing change because of the massive expenses and customer confusion involved in the change. Further, option two, if adopted, should include only changes in the tariff and not changes in billing. In this manner, more customers

were to mandate either option two or three, it should allow
the costs incurred in the conversion to be treated as

expenses under the new regulations.

CERTIFICATE OF SERVICE

I, Melinda L. Mills, hereby certify that I have on this 26th day of May, 1993, sent via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Comments of Sprint Corporation" in the Matter of Amendment to Part 61 of the Commission's Rules Requiring Metric Conversion of Tariff Publications and Supporting Information, CC Docket No. 93-55, filed this date with the Secretary, Federal Communications Commission, to the persons listed below.

ITS*
1919 M Street, N.W.
Room 246
Washington, D.C. 20554

Mr. Joel A. Ader*
Staff Manager - Federal Regulatory Resource Center
Bellcore
2101 L Street, N.W., Suite 600
Washington, D.C. 20037

* indicates Hand Delivery


Melinda L. Mills